

Marcus Leinart  
State Bar No. 00794156  
Leinart Law Firm  
10670 N. Central Exprwy, Ste 320  
Dallas, TX 75231  
469.232.3328 Phone  
214.221.1755 Fax  
ATTORNEY FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

<b>IN RE:</b>	§	
	§	
<b>Mario Vega Maysonet</b>	§	<b>CASE No. 20-43582-elm-13</b>
<b>Yarimar Cano-Martinez</b>	§	
<b>Debtors</b>	§	<b>CHAPTER 13</b>

**MOTION TO VACATE DISMISSAL ORDER AND REINSTATE CHAPTER 13 CASE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW BEFORE THE COURT, Mario Vega Maysonet Yarimar Cano-Martinez, Debtors in the above-numbered and styled cause, and files this their Motion to Reinstate Chapter 13 Case, and would respectfully show the Court as follows:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105 and 28 U.S.C. §1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. §157(b)
2. Debtors filed for Bankruptcy protection under Chapter 13 of Title 11, United States Code on 11/24/2020.
3. Debtors' case was dismissed on 11/2/2021 as a result of material default.

Debtors had not submitted their 2021 tax return. Debtors have now sent the return to the Chapter 13 Trustee.

4. Debtors understand that if the Court grants this Motion and allows the case to be reinstated, all payments to the Chapter 13 Trustee must be current.

5. Debtors is eligible for relief under Chapter 13 of the United States Code.
6. Debtors respectfully request this Court grant this request to reinstate their Chapter 13 case to this Court's active docket.
7. It was necessary for Debtor(s) to utilize the services of counsel, Leinart Law Firm, to present this motion. Debtor(s) request that Leinart Law Firm be allowed reasonable attorney fees for the representation in the amount of \$200.00, which are to be paid through the Chapter 13 plan.

WHEREFORE, PREMISES CONSIDERED, Debtors Mario Vega Maysonet Yarimar Cano-Martinez pray the Court order their Chapter 13 case be reinstated to this Court's active docket, and for such other and further relief as the Court deems just.

DATED: November 2, 2021

Respectfully Submitted,

Leinart Law Firm  
10670 N. Central Exprwy, Ste 320  
Dallas, TX 75231  
469.232.3328 Phone  
214.221.1755 Fax

By: /s/ Marcus Leinart  
Marcus Leinart  
State Bar No. 00794156  
ATTORNEY FOR DEBTORS

**CERTIFICATE OF SERVICE**

I hereby certify that on November 2, 2021, I did serve a true and correct copy of the foregoing to the following interested parties, and to those parties listed on the matrix as filed with the Court, by United States Mail, First Class:

Mario Vega Maysonet Yarimar Cano-Martinez  
6244 White Jade Drive  
Fort Worth, TX 76179

Office of the Standing Chapter 13 Trustee  
7001 Blvd 26, Suite 150  
North Richland Hills, TX 76180

United States Trustee  
1100 Commerce, Rm 976  
Dallas, TX 75242

/s/ Marcus Leinart  
Marcus Leinart  
Attorney for Debtors